

¹ Although the Court does not herein rule on the proposed discovery plan, the Court notes that the parties incorrectly state that Local Rule 26-4 requires requests to extend deadlines to be filed at least 21 days before the discovery cut-off. *See* Docket No. 44 at 4. Any renewed discovery plan shall correctly state that any such request must be filed at least 21 days before expiration of the subject deadline sought to be extended (*e.g.*, a request to extend the expert disclosure deadline must be filed at least 21 days before the expiration of that deadline).